

Nov 22, 2023

s/ D. Olszewski

Deputy Clerk, U.S. District Court  
Eastern District of Wisconsin

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Wisconsin

In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*information associated with the Instagram ID: 31452828829 and  
Facebook ID: 10000317772977 that is stored at premises owned,  
maintained, controlled, or operated by Meta Platforms, Inc., a company  
headquartered at 1 Meta Way, Menlo Park, California, 94025.

Case No. 23 MJ 217

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

Please see Attachment A.

located in the Eastern District of Wisconsin, there is now concealed *(identify the person or describe the property to be seized)*:

Please see Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1951(a)	Hobbs Act Robbery
18 U.S.C. § 924(c)	Brandishing of a Firearm during a Crime of Violence

The application is based on these facts:

Please see Affidavit.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days *(give exact ending date if more than 30 days: \_\_\_\_\_)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Heather Wright, Special Agent, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
\_\_\_\_\_ telephone \_\_\_\_\_ *(specify reliable electronic means)*.

Date: 11/22/2023


Judge's signature

City and state: Milwaukee, WI

Honorable William E. Duffin, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF**  
**AN APPLICATION FOR A SEARCH WARRANT**

I, Heather N. Wright, being first duly sworn on oath, hereby depose and state as follows:

**INTRODUCTION, BACKGROUND, TRAINING, AND EXPERIENCE**

1. I make this affidavit in support of an application for a search warrant for information associated with a certain Facebook or Instagram user ID that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc. (“Meta”), a social networking company headquartered at 1 Meta Way, Menlo Park, California, 94025. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require Meta to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user ID.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since July of 2010. Since August of 2020, I have been assigned to the FBI’s Milwaukee Area Violent Crimes Task Force, a multi-jurisdictional law enforcement entity charged with investigating violations of federal law, including bank robberies, commercial robberies, armed motor vehicle robberies, and other violent crime matters, defined under Title 18 of the United States Code. I have been trained in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and probable cause. I have participated in criminal investigations, surveillance, search warrants, interviews, and debriefs of arrested subjects. As a result of this training and investigative experience, I have learned how and why violent actors typically conduct various aspects of their criminal activities.

3. Based on my training and experience, I know that criminal investigations have been aided by subpoenas, warrants, and court orders related to electronic communication records by providing critical investigative leads and corroborative evidence.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. Based on the investigation to date and the facts as set forth in this affidavit, I submit that there is probable cause to believe that HUSSEIN A. HAJI (XX/XX/2001)), HURIA H. ABU (XX/XX/2002), JESSIE L. COOK (XX/XX/2003), ABDI A. ABDI, (XX/XX/2001), DARRION ALLISON, (XX/XX/2000) ABDI I. BABA (XX/XX/1998), OSMAN ALI (XX/XX/2000), and others, committed multiple armed robberies of United States Post Office mail carriers between October 25, 2022, and November 6, 2023. These offenses are in violation of violations of Title 18 U.S.C. § 1951(a), Hobbs Act Robbery, and Title 18 U.S.C. § 924(c), Brandishing of a Firearm during a Crime of Violence. There is also probable cause to search the information described in Attachment A for evidence of these crimes, as described in Attachment B.

### **PROBABLE CAUSE**

6. Affiant knows the Milwaukee Area Violent Crimes Task Force (MAVCTF) has been investigating a series of inter-related armed robberies of postal carriers since October 2022. These investigations have developed information that individuals, including HURIA ABU and OSMAN ALI, have at various times shared information about these robberies via social media, including those services operated by Meta, as detailed below:

#### A. INITIAL POSTAL ROBBERY INVESTIGATIONS

7. On October 25, 2022, the Milwaukee Police Department responded to an armed robbery complaint at 2650 N. Martin Luther King Drive, Milwaukee, Wisconsin. Upon arrival, officers spoke with the victim, identified as a United States Postal mail carrier, hereinafter referred to as D.D. D.D. stated that he had been conducting his route at approximately 2:30 P.M., and was about to start at 2500 N. Richards Street, when he was approached by four young males. D.D. described Subject #1 as possibly a Hispanic male, approximately 19 years old. D.D. stated that Subject #1 and three other males approached him from behind and demanded that he “give up his shit.” D.D. stated that he heard one of the subjects say that they had a gun to his back. D.D. stated that he told the subjects that he was not going to give them anything and quickly turned around to face the attackers, fearing that one of them may have a gun. D.D. stated that he did not observe any of the subjects with a firearm and immediately took a fighting stance. Three of the subjects ran away, while Subject #1 stayed and took a fighting stance as well. D.D. stated that as Subject #1 attempted to punch D.D., D.D. attempted to punch Subject #1. D.D. stated that he was unsure if his punch made contact with Subject #1, however, Subject #1 staggered back and ran away. D.D. stated that Subject #1 ran eastbound and eventually northbound towards the alley. D.D. stated that he chased after Subject #1, however, he lost sight of Subject #1 and returned to his vehicle. D.D. stated that when he returned to his vehicle, he was unable to find his USPS issued Arrow key that had been hanging around his neck on a lanyard.

8. On January 28, 2023, a photo array was presented to D.D. with the target of the photo array as JESSIE L. COOK (dob: XX/XX/2003). D.D. identified COOK as the individual that had demanded his things and attacked D.D. on October 25, 2022.

9. On December 7, 2022, the Milwaukee Police Department responded to 3205 N. Breman Street, Milwaukee, Wisconsin, for an armed robbery of a United States postal mail carrier, hereinafter referred to as E.V. E.V. stated that at approximately 3:00 p.m., he had just finished delivering mail to 3219 N. Breman Avenue and was walking south towards the next block when he passed two subjects who were walking northbound on the west sidewalk. E.V. stated that after they had passed, he could hear running footsteps approaching him from behind and he turned around. The same two subjects that had just passed him ran up to him and one had a gun pointed at him.

10. E.V. stated that Suspect #1 said “Gimme everything...gimme everything...gimme everything,” while pointing a small-framed semi-automatic hand gun at him. E.V. stated that he provided his ID and keys that were on a lanyard around his neck as well as the mail in his hands. E.V. stated that the key fob for the postal van as well as his Arrow key were on the key ring that was provided. The Arrow key was specifically assigned to E.V. that day and can open the blue mail boxes and some boxes at apartment buildings. E.V. stated that the serial number for the key provided was #30411. E.V. stated that Subject #2 took the ID with the keys attached but dropped the mail E.V. had handed to him. E.V. stated that he attempted to hand the Subjects his mail bag because it had scanned devices within the bag that could be GPS located, however, the subjects were not interested and were only interested in the lanyard and keys. E.V. stated that he then ran to a corner bar for safety and called the police. E.V. stated that the subjects ran southbound and heard a car squeal off in a hurry.

11. Shortly after the incident, a witness approached him and told him that he saw the suspects get into a white Nissan Murano. That particular witness could not stay on scene. However,

an additional witness also came forward and stated that they had observed the robbery and corroborated that she, too, had observed the suspects enter a white Nissan Murano.

12. A canvas for video surveillance was completed and video surveillance from a Ring doorbell was obtained at 3219 N. Breman Street. After a review of the video, Subject #1 was observed to be a black, male, late teens, approximately 5'10" tall, thin build, dark complexion, wearing a black hoody, black mask (above eyes showing), light gray pants, black shoes, armed with a black semi-automatic handgun. Suspect #2 was observed to be a black, male, late teens, approximately 6'0" tall, thin build, medium complexion, wearing a black hoody, black mask (above eyes showing), black pants, white shoes, unknown if armed.

13. On January 27, 2023, a state residential search warrant related to a drug investigation was executed at 2519 N. Buffum Street, Milwaukee, Wisconsin. Prior to the execution, two black males and two black females were observed leaving the residence in a blue Toyota Camry. Shortly thereafter and just prior to the warrant execution, the blue Toyota returned with two of the four individuals inside. When officers approached the vehicle, they identified the individuals as MARVIN TURNER (dob: XX/XX/2000) and HUSSEIN A. HAJI (dob: XX/XX/2001). Officers then executed the search warrant and identified HURIA H. ABU (dob: XX/XX/2002), JESSIE L. COOK (dob: XX/XX/2003), AMAURIE D. SMITH (dob: XX/XX/2005) as well as two females who were not residents of the house, hereinafter "S. J". and "S. W.". A search of the residence resulted in the recovery of a Glock 19 handgun (stolen out of Cudahy), a loaded Ruger P95 handgun, a loaded Ruger PC Charger carbine pistol, a loaded AK 7.62 cal pistol, a GSG rifle upper with mock silencer, hundreds of pieces of stolen mail including about 900 personal and commercial checks from Milwaukee, Shorewood, Brookfield, Brown Deer, as well as others. They further located checks being "washed" in acetone, keys on a bed

located in a bedroom that unlocked a safe which contained \$7000, (1) USPS arrow key, (1) set of USPS keys, (20) cellular telephones, and (2) laptop computers. Officers also located keys for a Nissan Murano that unlocked a white Nissan Murano parked outside the residence and matched the vehicle description used in the October 25, 2022 and December 7, 2022 robberies.

14. Following the arrests of HAJI, COOK, ABU, SMITH and TURNER, interviews were conducted. During the interview of COOK, COOK stated to detectives that he was the primary user of the Nissan Murano located at the residence during the execution of the search warrant. COOK admitted to being involved in the robbery of the postal carrier on October 25, 2022. COOK stated that COOK was the individual that punched the postal carrier during the robbery, however, COOK would not state why the mail carrier was targeted or who he was with during the robbery. COOK stated to detectives that he was the owner of a Samsung Galaxy 20 black cellular phone with telephone number 262-389-0018.

15. During the interview of HAJI, he admitted to detectives that he had participated in the robbery of the mail carrier that had occurred on December 7, 2022. HAJI stated that ABU was the driver, and that COOK had the gun and pointed it at the white mail carrier. HAJI stated that they used the Nissan Murano, and that HAJI was the individual that took the arrow key from the mail carrier. HAJI also admitted to Detectives that they were after the specific arrow key that mail carriers carry during the robbery. HAJI stated that HAJI, COOK, and ABU participated in “mail runs”, which are when a person removes mail from mailboxes. HAJI stated that he has participated in approximately 40 mail runs in at least four different vehicles. HAJI stated that the target of the mail runs are personal checks and that they sell them after they are located. HAJI stated that one of the methods of payment when selling the checks is CashApp. HAJI stated that the day he was arrested, he was taken into custody outside of the residence because he had been inside the Toyota.

HAJI stated that his firearm was located inside the Toyota on the passenger side floorboard. HAJI stated that he has owned the firearm for approximately one year and purchased it at the Shooter's club. HAJI stated that the last time he shot the gun was on New year's outside the house at 2519 N. Buffum Street at midnight on New Year's Eve. HAJI stated that he had fired the gun into the air.

16. On February 2, 2023, a Wisconsin state search warrant was obtained for all the cellular phones seized during the search warrant executed at 2519 N. Buffum Street. A review of the phones indicated that HAJI had obtained an arrow key, was using the arrow key to open mailboxes, steal personal checks from unwilling victims, and re-writing the checks to bank accounts associated to HAJI or another that HAJI had recruited to deposit the stolen check.

17. A review of the cellular phones determined that ABU utilized the Instagram username: riordinero.jr with the Instagram ID# 31452828829 (this account was located by FBI analysts and a photo of shoes with money as the profile picture was observed). On May 15, 2023, I swore to an affidavit requesting the authorization of a search warrant for ABU's Instagram and on May 15, 2023, the search warrant was authorized by the Honorable United States Magistrate Judge William E. Duffin. On June 8, 2023, writer received the results of the search warrant from Facebook and reviewed the results.

18. On February 10, 2023, the Milwaukee Police Department responded to an armed robbery that had occurred near 5273 N. 27<sup>th</sup> Street, Milwaukee, at approximately 11:40 A.M. The victim was identified as a United States Postal carrier, hereinafter referred to as N.M. N.M. stated that he had been working mail route 88, had parked his mail vehicle near 2626 W. Rhor, and walked to the door to deliver the mail. N.M. stated that as he began to approach the residence of 5273 N. 27<sup>th</sup> Street from the north, he walked onto the small porch to place mail into the boxes.



N.M. stated that he then observed three subjects come from the backyard (from the west of where he was) and surrounded him as he was on the porch. N.M. stated that he was somewhat trapped due to the railings on the porch and the three subjects surrounding him. N.M. stated that he had the ring of apartment keys in one pocket of his outer most jacket and the chain was exposed across his jacket leading to the Arrow key that was in the opposite pocket of his jacket.

19. N.M. described Subject #1 as a black male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck, with his eyes exposed, aviator sunglasses with plastic frames and gray/black lenses, a black hooded sweatshirt, dark jeans, unknown shoes, armed with a black Glock 9mm handgun with an extended magazine. N.M. described Subject #2 as a black, male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck with his eyes exposed, "beach style" square sunglasses, a black hooded sweatshirt, dark blue jeans, unknown shoes, armed with a black Glock 9mm handgun with a tan extended magazine and switch attached to the back of the gun. N.M. stated that N.M. knew the term "switch" to be an added part on a gun that makes the firearm fully automatic. N.M. described Suspect #3 as a black, male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck, with his eyes exposed, a black hooded sweatshirt, dark jeans, unknown shoes, armed with a black Glock 9mm handgun with an extended magazine.

20. N.M. stated that Suspect #1 was armed with a gun which he held at his side when he demanded N.M.'s keys. N.M. stated that he held up his hands while Suspect #1 grabbed the chain that was exposed outside of his jacket and took N.M.'s keys. N.M. stated that Suspect #2 approached him, used his gun to push up the brim of N.M.'s hat, and asked N.M. what else he had. N.M. stated that he told the suspect that he didn't have anything else. N.M. stated that Suspect #3

did not say anything to him or touch him, but was armed with a gun in his waistband and positioned himself with the other two Suspects. N.M. stated that after the suspects obtained N.M.'s keys, all three suspects fled on foot in the same direction they had approached. N.M. stated that he heard car doors opening and a vehicle drive away but he did not look into the alley to obtain a vehicle description nor which direction they fled.

21. A canvas for surveillance video was conducted and Ring video was located at 5248 N. 27<sup>th</sup> Street as well as surveillance video from 2800 W. Custer Ave. During the collection of the Ring video, officers were able to observe at 11:41AM, a white 2007-2012, 4 door, Nissan Altima driving southbound through the alley at a high rate of speed. The vehicle had tinted windows (including front window brow only), a sunroof, side window deflectors, six spoke aluminum rims (split spokes), damage to rear passenger bumper/quarter panel, damage to front passenger quarter panel, dual exhaust, and front and rear unknown registration plates. During a review of the surveillance video obtained from 2800 W. Custer, Officers observed the white Nissan Altima approach the alley at 11:38 A.M., from the west and drive southbound in the alley. Multiple suspects can be observed exiting the vehicle and proceed towards where the victim was robbed. The white Nissan continues southbound in the alley following the incident.

22. On February 13, 2023, at approximately 2:52 PM., a law enforcement member of the Milwaukee Area Violent Crimes Task Force (MAVCTF) observed a vehicle matching the above description driving west on North Avenue from 73<sup>rd</sup> Street. The vehicle was a 2010 Nissan Altima 4 door (WI plate AJF-7039). The vehicle subsequently pulled into the Brother's Plus Grocery Store located at 4020 W. North Avenue. Task Force Officers (TFOs) observed a thin black male with shoulder length dreads exit the vehicle's front passenger door and enter the business. The subject was wearing a black T-shirt, camouflage pants, and white/black shoes. The

subject then exited the store and re-entered the Altima's front passenger door. TFO Strasser obtained a short video of the subject during the course of the surveillance.

23. The vehicle was then observed driving to and parking in the rear 2225 N. 35<sup>th</sup> Street. Task Force Officers were able to run the plate and noted that the vehicle listed to ABDI BABA (dob: 01/01/1998), with an address of 2303 W. Cherry Street. This same vehicle was observed via a law enforcement camera system at West Silver Spring Drive and North Green Bay Avenue on February 10, 2023, at 11:08 A.M. The robbery occurred on February 10, 2023, at approximately 11:41 A.M and is 0.9 miles away from the West Silver Spring Drive and North Green Bay Avenue intersection.

24. A short video clip of the surveillance of the subject that was observed getting in and out of the Nissan Altima was shown to TFO Dolan, who was able to identify the subject as HURIA H. ABU, a subject that had been arrested during a related investigation on January 27, 2023. TFO Dolan was able to identify the subject as ABU, based on his prior interactions with him.

25. On March 13, 2023, Law Enforcement members of the MAVCTF and Milwaukee Police Officers responded to an armed robbery of a United States Postal carrier near 4548 N. 38<sup>th</sup> Street, Milwaukee. The victim, identified and hereinafter referenced as M.P., stated that at approximately 1:00 p.m., he parked his truck at 4501 N. 38<sup>th</sup> Street on the west side of the street, facing south. M.P. stated that while delivering mail at 4514 N. 38<sup>th</sup> Street, he observed two black male suspects on the west side of the street walking southbound. M.P. stated that the two seemed suspicious because they had masks on. M.P. stated that the two suspects walked past his truck, then walked in front of his truck eastbound. The suspects then went north on the east side of N.

38<sup>th</sup> Street. M.P. stated that he later observed them duck by the houses near 4518 N. 38<sup>th</sup> Street while he was further north delivering mail.

26. M.P. stated that when he got near 4548 N. 38<sup>th</sup> Street, he observed the two suspects running at him. M.P. described Suspect #1 as a black, male, approximately 16 years old, approximately 5'4" tall, short, thin build, wearing a dark royal blue coat, black running pants, armed with a Draco styled gun with a wooden stock. M.P. described Suspect #2 as a black, male, approximately 6'0" tall, light complected, wearing a black jacket and black jogging pants. M.P. stated that one of them stated "don't run now bitch." M.P. stated that Suspect #1 pointed the gun at his head and said, "Give me the keys. Give me the keys. I'll shoot you." M.P. stated that they tried grabbing his keys from the right side of him, but they were on a lanyard. M.P. stated that he told them that the keys were on a lanyard, so they unclipped them and ran northbound from the location and continued eastbound on W. Glendale.

27. A witness to the incident, hereinafter P.M., stated that she heard talking outside and looked out her front window and observed the postal carrier running. She stated that she got up to the storm door and observed two suspects, one of which had a gun pointed at the postal carrier and was wearing a blue coat. P.M. stated that she heard the postal carrier say "ok..ok" but did not hear what the suspects were saying. P.M. stated that she then grabbed her three-year-old nephew and pulled him to the ground for fear that shots would be fired. P.M. stated that she waited for the suspects to leave and called the police.

28. Video surveillance was obtained from the Hopkins Food Mart located at 4601 N. Hopkins Street, Milwaukee. The cameras were located on the south side of the business and the east side of the business. MACTF investigators observed a 2009 silver Honda Civic with front and rear plates, no sunroof, damage to front driver's quarter panel, 7 spoke hubcaps, broken front driver

hubcap, with the front passenger inner headlight on (others defective), circling the block and fleeing the area of the robbery, just after it took place.

29. An attempt to identify the vehicle was conducted by querying FLOCK and ALPR cameras in the area with a similar suspect vehicle description. A hit on a 2009 Honda Civic 4 door, WI plate ABG-8200, was obtained at several times on March 13, 2023 at the following locations:

- a. 16:26 – 21 SWE W. Fond Du Lac at Capital Ave.
- b. 13:36 – #01 N/B Port Washington @ Hampton Ave
- c. 12:19 – #10 MLK & W North – S/B
- d. 11:42 – 25 S/B N. Sherman at W Hampton
- e. 8:33 – 07 S/B N. 35<sup>th</sup> Street at W. Wisconsin

30. The vehicle listed to a Mohammed F. Omar (dob: XX/XX/1990) of 1809 W. McKinley Avenue, Milwaukee.

31. A Milwaukee Police database query was then done for the Wisconsin plate ABG-8200. A call for service regarding a subject with a gun and shots fired was received on January 2, 2023 near North Buffum Street and East Wright Street. A second caller then called and reported that her house had been struck by gunfire at 2513 N. Buffum Street. Officers responded and ran all vehicles in the area including a silver 2009 Honda Civic, WI plate ABG-8200, which was parked in front of 2519 N. Buffum Street (next door to 2513 N. Buffum, and also struck by the gunfire) when officers arrived. A body camera review of the responding officer was reviewed by investigators and the 2009 silver Honda was also observed driving by the officer at 10:42 a.m. on January 2, 2023.

32. On March 14, 2023, an offline search of the 2009 Honda Civic, WI plate ABG-8200, was done and on December 19, 2022, the vehicle was run by Whitefish Bay Police

Department. I contacted Whitefish Bay Police Department on March 14, 2023 and confirmed with Whitefish Bay Detective Joe McLeod that the vehicle was traffic stopped on December 19, 2022 at 9:48 p.m., at the intersection of Santa Monica and W. Silver Spring Drive in Whitefish Bay, for speeding, driving without a license, and failure to stop at a stop sign. The driver of the vehicle was identified as HURIA H. ABU, dob: XX/XX/2002. ABU provided Whitefish Bay with a home address of 2519 N. Buffum Street. During a review of the body cam of Whitefish Bay officers during the traffic stop, ABU can be observed speaking with officers in the driver's seat of the vehicle. During the interaction, ABU was observed holding a cellular telephone with a red case. ABU provided officers with the cellular telephone in order to provide a photo of his identification card. Again, the cellular telephone can be seen being handed to the Whitefish Bay officer by ABU in a red case. The cellular telephone is then handed back to ABU by the officer. ABU also provided officers with his home address of 2519 N. Buffum Street in Milwaukee.

33. Following the arrest of COOK, ABU, SMITH, TURNER, and HAJI, on January 25, 2023, only COOK and HAJI were held in state custody. All others were released and on February 10, 2023, the next robbery of a United States Postal carrier for his Arrow key occurred. The suspect vehicle in that robbery was the 2010 Nissan Altima 4 door (WI plate AJF-7039) registered to BABA who is associated to ABU. ABU was observed on February 13, 2023, exiting the Altima during a law enforcement surveillance. The suspect vehicle of the United States Postal carrier robbery on March 13, 2023 was identified as a 2009 Honda Civic 4 door (WI plate ABG-8200). ABU was stopped by Whitefish Bay Police Department on December 19, 2022, driving this suspect vehicle.

34. On March 20, 2023, I swore to an affidavit requesting Timing Advance "True Call" area search for all records and unique device/user identifiers pertaining to Timing Advance

location information of the February 10, 2023 armed robbery of the mail carrier at 5273 N. 27<sup>th</sup> Street at around 11:40 a.m., and the February 10<sup>th</sup> law enforcement camera plate identification of the suspect vehicle at W. Silver Spring Drive and N. Green Bay Avenue around 11:41 a.m.. I received the results for that warrant from T-Mobile on March 28, 2023.

35. On March 28, 2023, at approximately 4:45 p.m., an armed robbery of a mail carrier occurred at 4616 W. Hope Avenue, Milwaukee, Wisconsin. The victim, hereinafter A.A., was delivering mail at the location, when two suspects approached her while on the porch of the residence. Suspect 1 was described as a black, male, approximately 17 years old, approximately 5'5". With a slim build, wearing a gray hooded sweatshirt with the hood up, skinny blue jeans, and armed with a black semi-automatic hand gun in his right hand. Suspect 2 was described as a black, male, approximately 18 to 20 years old, approximately 5'4", and a stocky build. Suspect 1 pointed a black semi-automatic handgun at A.A.'s chest and demanded her keys multiple times. A.A. stated that Suspect 1 began to search the pockets of the USPS vest that A.A. was wearing and removed her personal Android phone, the key fob to the USPS mail truck, which was parked down the street, and removed a USPS tracking device that was on a strap around her neck. A.A. stated that the two suspects fled from the scene on foot westbound on Hope Avenue and then south on N. 48<sup>th</sup> Street.

36. On April 23, 2023 and into April 24, 2023, Members of the Milwaukee Area Violent Crimes Task Force conducted a surveillance operation of known mailboxes that have experienced mail thefts. Postal Inspector Chris MASSARI provided information that the mailboxes at 5995 N Teutonia Ave (City and County of Milwaukee) and 5521 W Center St (City and County of Milwaukee) had both been targeted and had mail stolen from them.

37. On April 23, 2023, at approximately 11:15 p.m., officers observed two males

running eastbound on W Florist Ave towards N. Teutonia Ave where there were known USPS mailboxes. Suspect 1 was tall, possibly 6'00" to 6'03" with a medium build, wearing dark pants, a dark hooded sweatshirt with the hood up, and possible writing on the front of the sweat shirt. Suspect 1 was later identified as DARRION ALLISON. Suspect 2, was short, possibly 5'05" to 5'07" wearing what appeared to be an Adidas jacket or sweatshirt. The jacket or sweatshirt was dark or black with stripes going down the shoulders ending at approximately the elbow area. Suspect 2 was later identified as ABDI ABDI.

38. ALLISON acted as a lookout as ABDI crouched down and opened the mailbox located at 5995 N. Teutonia Ave. The mailboxes can only be opened with an Arrow Key. The suspects removed what appeared to be mail from the mailbox and then fled westbound on W Florist Ave where they got into a vehicle parked on the south side of W Florist St in the 3400 block and then fled westbound in a dark colored Chevrolet Malibu, with no rear plate.

39. At approximately 12:00 a.m., FBI Analyst Emily SLAJUS observed via a live stream video feed, the same two subjects go to the mailboxes at the post office located at 5521 W Center Street, in Milwaukee, open the mailboxes, appear to take the mail, and then flee. FBI Analyst Slajus then communicated this to undercover MAVCTF surveillance units. Task Force Officer Michael SKEMP (Brookfield PD) and Special Agent Ian BYRNE were in an undercover vehicle and were travelling north on Sherman Blvd from W Wright St and responded to the area. TFO SKEMP called out the vehicle over Milwaukee Police Radio and a traffic stop was conducted.

40. The driver of the vehicle was identified as ALLISON and the front passenger seat was identified as ABDI. ABDI and ALLISON were arrested and taken into custody without incident. Following a search of ALLISON's person for officer safety, an Arrow Key with serial



number 77-32733 on it was located in ALLISON's front left pocket which matched the key stolen during the March 13th armed robbery. The Chevrolet Malibu's listed owner was ABU and was registered to the address of 2519 N Buffum Street. Inside of the glovebox of the Malibu were two pieces of mail addressed to ABU. A search of the vehicle was conducted by members of the MAVCTF. In the front passenger seat, where ABDI had been seated, were two large black plastic garbage bags containing approximately 400-500 pieces of mail, multiple bank cards, two personal checks, and a box of black garbage bags in the trunk of the vehicle.

41. On Monday, April 24, 2023, members of the MAVCTF observed ABU exit the Clark gas Station located at 2242 N. 12<sup>th</sup> Street in Milwaukee and enter a light blue Chrysler 200 with no plates. ABU was observed entering the driver's seat of the vehicle and drove east on North Avenue. A traffic stop of the Chrysler was conducted and ABU was taken into custody without incident.

42. In a Mirandized interview, ALLISON admitted to being a part of the robbery on March 13, 2023 at 4548 N 38th St in the City and County of Milwaukee. He said that robbery occurred because a few nights prior ABDI was using a different Arrow Key to get mail from mailboxes and the key broke off in the mailbox. ALLISON stated ABU was extremely upset about this and threatened ABDI to get another key. ALLISON explained ABU was known as "The Don" and was the leader of this group that steals mail, alters and cashes checks and robbed mail carriers for their USPS Arrow Keys. ALLISON stated that they refer to ABU as "the Don" but ABU preferred to be called "Wiz.". Following ALLISON's arrest, ALLISON's phone was recovered in the console of the vehicle and during the search of the vehicle, ALLISON was receiving a number of missed telephone calls from an individual saved in ALLISON's phone as "Wiz". ALLISON stated he believed that ABU would have hurt or killed ABDI if he did not get a new key.

43. ALLISON further stated that on March 13, 2023 he had met up with ABDI, ABU, LAZARUS JONES and DESHAWN ROBINSON. ALLISON stated that he was driving the Honda and ABDI was in the back seat while ABU followed them in a Malibu. ALLISON stated that they drove around and eventually found a mail carrier. ALLISON stated that ABU then got into the Honda and JONES got into the Malibu. ALLISON stated that they then circled back around and he (ALLISON), ABDI, and ROBINSON went and robbed the mail carrier at gunpoint. ALLISON stated that ABDI had a Draco styled pistol that had been provided by ABU. ALLISON said ABDI found the key in the mail carriers' bag and pulled them out. After taking the keys, ALLISON stated that ABDI "racked" the Draco AK-47 and was scared that ABDI was going to shoot the mail carrier. ALLISON stated that they ran back to the vehicle after doing the robbery. ALLISON stated that as soon as they entered the vehicle, ABDI handed over the Arrow Key and the Draco styled pistol back to ABU. ALLISON stated that ABDI and ABU were all laughing about the robbery then. ALLISON said they did the robbery under the direction of ABU.

44. In a mirandized interview, ABU admitted to being present for the March 13th armed robbery and admitted knowing there would be a robbery for an Arrow Key. ABU also admitted to being the driver and look out during the December 7, 2022 armed robbery. ABU further admitted being present for the February 10, 2022 armed robbery and acknowledged that an Arrow Key was taken. ABU stated that BABA had approached ABU regarding obtaining a mail key from a postal carrier on February 10, 2023, and that BABA had participated in the robbery of the mail carrier on that date. ABU stated several times during the interview that he did not commit the robberies but that he was "party to a crime." ABU provided a consent to search for the cellular phone that was seized from his person at the time of his arrest.

## B. INVESTIGATION INTO ABU'S SOCIAL MEDIA

45. Following his arrest, ABU's jail calls were monitored by members of the MAVCTF. During one of the monitored jail calls, ABU references his Instagram Accounts to a female caller in an attempt to have her login. ABU stated that his Instagram account username was "29.wiz". It was determined that this Instagram account had an Instagram ID# "31452828829". This profile was publicly available and had a most recent public activity of June 2, 2022.

46. On April 11, 2023, a federal grand jury in the Eastern District of Wisconsin, issued a two-count indictment against HAJI for violations of Title 18, United States Code, Sections 1951(a) and 2(a) and Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2(a) and on June 27, 2023, a federal grand jury issued a nine count superseding indictment against ABU, COOK, HAJI, ABDI, and ALLISON, for violations of Title 18, United States Code, Sections 1951(a) and 2(a) and Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2(a), and Title 18, United States Code, Sections 1708.

47. On May 15, 2023, I swore to an affidavit requesting the authorization of a search warrant for the social media account identified by ABU as his Instagram account," Instagram ID# "31452828829", as well as others, and on May 15, 2023, the search warrant was granted. On June 7, 2023, the warrant return was received.

## C. FURTHER POSTAL ROBBERIES

48. On September 13, 2023, at approximately 1:55 p.m., a strong armed robbery of a USPS mail carrier, hereinafter K.D., took place near the area of 1432 S. 15<sup>th</sup> Street., Milwaukee, Wisconsin. Upon retrieval of the complaint, the Milwaukee Police Department and members of the MAVCTF responded to the area. K.D. stated that he was conducting his standard mail route

on the south side of Milwaukee and parked his USPS mail truck at the curb in front of 1502 W. orchard Street, facing east. K.D. stated that he observed a black BMW X3 SUV with dark tinted windows driving eastbound on W. Orchard Street and observed it turning northbound onto S. 15<sup>th</sup> Street. K.D. stated that the BMW drove past him and a few seconds later, he heard “Ahye!” from behind him causing him to turn around.

49. K.D. stated that he turned towards the noise and observed the BMW had stopped on S. 15<sup>th</sup> Street approximately 10 feet away from him and both rear doors were open with two suspects standing outside the doors. K.D. stated that the suspect who exited from the rear passenger side door, Suspect 1, walked towards him while the suspect who exited from the rear driver’s side door, Suspect 2, walked to the rear of the BMW and stood behind the rear bumper. K.D. described Suspect 1 as a black, male, approximately 23 years old, approximately 5’10”-6’0”, stocky build, dark complexion, wearing a black ski mask with one opening for both eyes, black T-shirt and blue jeans. K.D. described Suspect 2 as a black, male, approximately early 20s, approximately 5’8”, thin build, light complexion, wearing a black ski mask with one opening for both eyes, a black T-shirt, and blue jeans. K.D. stated that Suspect 1 walked up to him and told him “give me your keys. That’s all I want.” K.D. stated that he believed that he was being robbed due to both actors approaching him with ski masks and it was sunny and 65 degrees. K.D. stated that USPS had also made him aware that there had been a recent spree of armed robberies of mail carriers where USPS “arrow keys” were taken, including one where a mail carrier was killed. K.D. that this knowledge combined with his observations of the suspects, caused him to believe that he was being robbed and would be shot if he did not comply.

50. K.D. stated that he pulled his keys out of his USPS bag he had over his shoulder and handed them to Suspect 1. K.D stated that Suspect 2 stated “come on, let’s go” and both

suspects got back into the rear doors of the BMW and the BMW drove off northbound on S. 15<sup>th</sup> Street crossing over W. Greenfield Avenue. K.D. confirmed the keys taken from him by Suspect 1 was the key fob for his mail truck and a USPS “arrow key” bearing serial number 77-32028.

51. Based on surveillance footage and a check of law enforcement cameras in the general area with the vehicle description, a suspect vehicle was identified as a black BMW X3 bearing WI plate ATU-8493, registered to Ryan J. Enterprises LLC, located at 3861 N. 99<sup>th</sup> Street in Milwaukee.

52. On September 13, 2023, MPD Detectives spoke with the vehicle owner, R.M.. R.M. stated that the black BMW X3, with butterscotch colored interior, was rented through the “Turo” application. R.M. had an app associated to the vehicle located on his cellular phone and stated that the vehicle was rented on Monday, September 11, 2023, at 9:30 a.m.. R.M. showed detectives a photo of the renter and his license. The renter was observed to be Jeremy C. Matthews (dob: XX/XX/1989). R.M. stated that he was able to track his vehicle, and noted that at one time, he contacted the person renting his car because they were going 102 mph. R.M. was able to provide detectives with vehicles current location and the vehicle was subsequently traffic stopped by the Wisconsin State Patrol and the Milwaukee Police Department.

53. The occupants of the BMW were identified as PAUL LENNART, OSMAN ALI, and YUSSUF ALI. LENNART stated that he was homeless and did odd jobs for OSMAN. LENNART stated that he stayed at a homeless encampment near the park and ride at S. 20<sup>th</sup> Street and College Avenue. LENNART stated that between 7 p.m. and 7:30 p.m., OSMAN pulled up to his tent and asked LENNART if he wanted to make some money by driving OSMAN to Madison, Wisconsin. LENNART stated that OSMAN was in a black sedan. LENNART stated that they

drove to a garage near N. 52<sup>nd</sup> Street and W. Capital Avenue, where they switched vehicles, and picked up the BMW X3.

54. OSMAN and YUSSUF were taken into custody regarding the robbery that had occurred earlier that day on S. 15<sup>th</sup> Street. Four cellular phones, along with a lanyard containing USPS keys (minus the arrow key), were recovered from inside the vehicle. Also located within the vehicle, was a BMO Harris check addressed to “Lynn Cases” for the amount of \$7,550.35, various other pieces of mail addressed to different people, and a pair of white leather Air Jordan style shoes.

55. During the interview of YUSSUF, YUSSUF stated that OSMAN was his cousin, he was not from Milwaukee, and was just visiting the area. YUSSUF stated that on Wednesday, September 13, 2023, OSMAN received a call from his buddies who wanted OSMAN to come pick them up. YUSSUF stated that OSMAN and he picked up two males wearing masks, YUSSUF stated that he thought that they were going to commit a house robbery, because “that was what they do in New York”. YUSSUF stated that when they arrived at the robbery location, OSMAN did a U-turn and the two males, seated in the rear of the vehicle, told OSMAN “right here, right here.” YUSSUF stated that neither he nor OSMAN stepped out of the vehicle during the robbery, however, he admitted to being a witness to the robbery. YUSSUF stated that when YUSSUF asked OSMAN what the subjects had stolen, OSMAN stated that they were going to “get him some shit and get some plays going” and “when they hit the box, they will make it right.”

56. A state search warrant for the cellular telephones recovered from the vehicle was obtained and the cellular phone, identified by YUSSUF as his, with phone number 602-318-0786, was reviewed for content. Two photos were observed in a shared/AppGroup/Telegram-

data/account with a creation date of September 13, 2023 at approximately 1402 hrs. The two photos appear to be a USPS arrow key with a key cut similar to series 77 (Milwaukee County) and a sticker/label on the key head with the numbers "042 (last number is cut off) printed on it. The photos' location appeared to be taken inside of a vehicle with butterscotch seat interior with black textured floormats. Only the legs of the person in the photo were visible and they were wearing red basketball mesh style shorts, white ankle socks, and wearing well-worn (white leather faded) Air Jordan style shoes. Other images on the phone were exemplars of handwritten signatures, multiple pictures of checks not addressed to YUSSUF, credit cards not in his name, multiple pictures of US currency fanned out and bundles, screen shots of bank mobile deposits and bank summary from online sites, USPS money orders, receipts from ATM withdrawals and deposits, selfies in front of high-end vehicles, a check soaking in a bowl of clear liquid, and a photo of a USPS delivery truck.

57. A review of a second phone, belonging to YUSSUF, with telephone number 929-636-1155, identified photos of multiple photos of checks not addressed to YUSSUF, credit cards not in his name, photos of driver's licenses and social security cards not in his name, multiple photos of US currency fanned out and bundled screen shots of bank mobile deposits and bank summaries from online sites, USPS money orders, receipts from ATM withdrawals/deposits, a photo of a Chase check with an Exacto knife and a drafting eraser in the frame, a photo of a person sitting in the rear driver's side of what appears to be the BMW, based on the butterscotch interior of the vehicle, a photo of a USPS issued arrow key (not keyed for MKE county), and a photo of printers and laptops set up in a car as a mobile workstation, holding a bank check.

58. A review of OSMAN's phone, identified as telephone 414-400-1798, identified multiple pictures of checks that were not addressed to/from either OSMAN/YUSSEF, screen shots

of other postal mail theft suspects from local news, electronic examples of check formats, credit cards not in OSMAN's name, driver's licenses and social security cards not in OSMAN's name, multiple pictures of US currency fanned out and bundled, screen shots of bank deposits and bank summaries from online sites, photos of accepting cash from what appears to be a bank teller, USPS money orders, receipts from ATM withdrawal/deposits, and screen shots of Zelle transactions. The second phone belonging to OSMAN was not able to be extracted.

59. A follow-up interview of the renter of the BMW, Jeremy MATTHEWS, was conducted on September 15, 2023. MATTHEWS stated that he rented the BMW, on September 11, 2023, for OSMAN, whom he had known for the last year. MATTHEWS stated that he worked on OSMAN's vehicles and had also worked on some houses that OSMAN owned. MATTHEWS stated that on September 11, 2023, OSMAN asked MATTHEWS if he could rent a vehicle for him because he did not have a valid ID. MATTHEWS stated that he received \$200.00 to rent the car through an app called TURO. MATTHEWS stated that OSMAN used his own phone to set up the TURO app and set up the rental. MATTHEWS stated that he used OSMAN's phone to take a photograph of his ID and he picked up the car.

60. On November 6, 2023, the Milwaukee Police Department and member of the FBI's MAVCTF responded to an armed robbery of a postal carrier in the area of 3436 S. 12<sup>th</sup> Street, Milwaukee Wisconsin at approximately 10:16 a.m.. The victim, hereinafter H.H., stated that she had just delivered mail at 3436 S. 12<sup>th</sup> Street and was in the front yard, about to walk northbound, when she observed three armed subjects approach her from the north on the sidewalk. H.H. stated that all three subjects "racked" their handguns and Suspect #1 stated "give me everything you got." H.H. stated that she provided the suspect with her cellular phone and the key to her USPS mail carrier vehicle. H.H. stated that Suspect #3 removed her mail bag from her shoulder and the



package scanner which was located on her right hip. H.H. stated that Suspect #2 stood by the others but did not speak or take any items from her. H.H. stated that all three suspects fled northbound and then eastbound through the yard between 3364 and 3376 S. 12<sup>th</sup> Street out of her view. H.H. described Suspect #1 as a Hispanic, male, medium complexion, approximately 5'9" to 6'0", thin build, wearing a blue "army" jacket, dark pants, black mask, armed with a black semi-automatic handgun. H.H. described Suspect #2 as a Hispanic, male, approximately 5'9" to 6'0", medium complexion, thin build, wearing a green jacket, dark pants, black mask, armed with a black semi-automatic handgun. H.H. described Suspect #3 as a Hispanic, male, approximately 5'9" to 6'0", medium complexion, thin build, wearing a black jacket, dark pants, black mask, armed with a black semi-automatic hand gun. H.H. stated that her USPS issued arrow key was not taken due to her leaving the key locked inside her USPS van and did not have it on her person at the time of the robbery.

61. The mail bag belonging to H.H. was located by a citizen at 3351 S. 11<sup>th</sup> Street in the alley following the robbery. A canvas for surveillance video located video footage of the suspects walking southbound on S. 12<sup>th</sup> Street at 10:16:03 towards the area where the victim stated the robbery had occurred. The suspects walked out of camera view at 10:16:14 and are, again seen, running northbound on the sidewalk at 10:17:06. Suspect #3 was carrying a USPS bag and Suspect #2 appears to have an object in his right hand resembling a firearm. The suspects are out of camera view at 10:17:12.

62. During the canvas for video in the area of 3436 S. 12<sup>th</sup> Street, at approximately 11:10 a.m., I was informed that another USPS mail carrier armed robbery had occurred in the area of 3200 S. 48<sup>th</sup> Street, Milwaukee Wisconsin. The Milwaukee Police Department and members of the MAVCTF responded and made contact with the victim, hereinafter H.P.. H.P. stated that while

he was delivering mail at 2120 S. 48<sup>th</sup> Street, he noticed three subjects standing in the alley on the north side of 3125 S. 48<sup>th</sup> Street. H.P. stated that he thought the subjects looked suspicious because they were all wearing black hooded sweatshirts with the hoods up and black masks covering their mouths and noses in the warm weather. H.P. stated that he could not tell the race of the subjects due to the clothing and masks but estimated that they were between the ages of 18-20 years old due to the way the subjects moved around and carried themselves.

63. H.P. stated that the subjects walked westbound in the alley from S. 48<sup>th</sup> Street and out of sight. H.P. stated that he then crossed S. 48<sup>th</sup> Street to the west and delivered mail to the houses on the west side of the street. H.P. stated that he crossed back over to where his mail truck was located. H.P. stated that prior to him crossing the street, the same three subjects from the T-alley, were standing on the southwest corner of S. 48<sup>th</sup> Street and W. Euclid Avenue. H.P. stated that when he arrived at his mail truck and opened the sliding door to his vehicle, two of the subjects that were standing on the corner, had him at gunpoint, while the third subject stood behind him. H.P. stated that all three subjects stated “give up the arrow kay!” H.P. stated that one of the subjects pointed a black semi-automatic handgun to his forehead and the other had some type of longer gun to his body. H.P. stated that the tip of the gun was red around the barrel which led him to believe that the gun may have been fake. The subject behind him grabbed around his waist and took the remote key fob to the mail truck. The subjects demanded the arrow key so H.P. reached into his bag where he carried it, and handed it over. H.P. stated that all three subjects fled on foot towards S. 47<sup>th</sup> Street and then north in the alley between S. 48<sup>th</sup> Street and S. 47<sup>th</sup> Street. The serial number for the arrow key obtained was determined to be 77-32024.

64. A canvas for video surveillance was conducted and video surveillance was obtained. Through a preliminary review of the video surveillance, investigators were able to

identify a suspect vehicle as a black, Honda Accord with a spare tire on the rear driver's side of the vehicle. A check of law enforcement cameras in the area identified a vehicle matching the suspect vehicle description and identified the vehicle as a black Honda Accord bearing Wisconsin registration plate AVK-2428, registered to TRUE SERWIN, dob: XX/XX/2005, at address 3239 S. 26<sup>th</sup> Street, Milwaukee. Also, during the review of surveillance video, a silver/gray Chevrolet Cruz was identified as being in the area of the armed robbery that took place. This vehicle was observed to have Wisconsin registration plate AVT-4859, registered to SHAE GAY, dob: XX/XX/2007, at address: 3239 S. 26<sup>th</sup> Street, Milwaukee.

65. At approximately 2:03 p.m., the suspect vehicle was located by MPD officers and a traffic stop was initiated. The vehicle fled from police and pursuit ensued. After approximately 10 minutes of officers attempting to stop the vehicle, the suspect vehicle came to a stop and the occupants of the vehicle fled on foot. TRUE SERWIN, EH HSET, dob: XX/XX/2008 and JESSIE HERNANDEZ, dob: XX/XX/2005, were taken into custody. CHRISTIAN LARA, dob: XX/XX/2002, who had fled from the vehicle earlier on in the chase, was also taken into custody.

66. A consent to search for the vehicle was provided by SERWIN. A blue sweatshirt, matching the description of the sweatshirt seen on Suspect #1 in the first armed robbery, that occurred near 3436 N. 12<sup>th</sup> Street, was located inside the vehicle, as well an olive-green jacket that matched the description of the jacket worn by Suspect #2. Black puffy slides were also located near the suspect vehicle matching the shoe description of Suspect #2. A loaded, black, Glock 40 caliber, handgun bearing SN: HGA037, was recovered from the rear driver's seat of the vehicle and a loaded black unknown make/model (ghost gun) 9mm semi-automatic handgun was located in the flight path of HERNANDEZ, near the rear alley of 5223 N. 30<sup>th</sup> Street. A black and brown Daisy BB gun rifle was recovered from inside the trunk of the vehicle along with a laptop, located

inside the rear trunk of the vehicle, with the name “JOSE FREDRICO-FLORES” (XX/XX/2005) with the high school name “Rufus King High School”.

67. During the pursuit of the suspect vehicle, a silver/gray Chevrolet Cruz, bearing Wisconsin registration plates AVT-4859, was observed in the area of the chase. On November 6, 2023, MPD detectives went to the address of 3239 S. 29<sup>th</sup> Street, Milwaukee, to conduct a search regarding this incident. Detectives located the Chevrolet Cruz parked in front of the residence and GAY located inside the residence. GAY told detectives that he and his father own the vehicle and that he was the only person that drove the vehicle. GAY stated that he had driven the vehicle that day along with a friend, who he refused to identify. GAY was taken into custody by MPD regarding the armed robbery.

#### D. INVESTIGATION INTO SOCIAL MEDIA CONNECTIONS BETWEEN ROBBERIES

68. During the interview of SERWIN, he confessed that he was the driver of the suspect vehicle during both armed robberies that occurred on November 6, 2023. SERWIN stated that FREDRICO-FLORES, HERNANDEZ, HSET and LARA were involved in the armed robberies of the postal carriers. SERWIN stated that they committed the armed robberies in order to obtain the postal carrier’s “arrow key” and they were going to sell it to a subject named “OZY ALI”. SERWIN stated that he knew ALI from playing soccer and has known him for approximately one year. SERWIN stated that ALI’s telephone number was 262-201-5873 and that he communicated with ALI via Facebook and through text message. Detectives interviewing SERWIN were able to confirm ALI’s Facebook ID number as “100003177772977”. SERWIN stated that ALI told SERWIN to bring him an arrow key and he would get paid \$500. SERWIN stated that he did not know what an “arrow key” was so he had to look it up. SERWIN stated that the arrow key was a

key to unlock “all the mailboxes”. Detectives were able to observe messages within SERWIN’s phone of the conversations between ALI and SERWIN discussing how ALI was to obtain an arrow key:

- ALI: “U no the (picture of a key) the postal ppl be carrying around just take em and bring em to me Easy”
- SERWIN: “Brooooo, you could ben told me that I been doing that”
- ALI: “call me, U go me fasho?”
- SERWIN: “We got you big bro I never know you could been told me ts too easy”
- ALI: “Bet just hit me up”
- SERWIN: “My guys doing it now, Ik they gon get it, Just wait”
- (The text then displays multiple text with arrow key photos)
- SERWIN: “This how it looks like?”
- ALI: “yea”
- ALI: “Call back can’t hear”
- (There was then other picture of a postal key)
- ALI: “It gotta be this or something like this bro that’s it”
- ALI: “Yoo u no how to hit the box”
- ALI: “Yooo”

69. SERWIN identified OZY ALI as OSMAN ALI (XX/XX/2000). SERWIN stated that stated that he was positive of the identification and that ALI told him to obtain the arrow key from the mail carrier. ALI also told SERWIN to delete all their social media communications.

70. On November 9, 2023, I was able to search the Instagram return obtained on June 7, 2023, from Meta, belonging to ABU, for communications between ABU and OSMAN ALI. I located an Instagram profile “ozyyali” with Instagram ID “1137539613”. I used open source

searches of Instagram and Facebook and observed that both the Facebook Page identified by SERWIN as belonging to ALI, had the same profile photo as the Instagram account “ozyyali”, with Instagram ID “1137539613”. During the review of messages, dating back to January 8, 2022, ABU and ALI discuss check fraud. There are multiple images sent between ABU and ALI of bank account screen shots, checks, money orders, cash, receipts from deposits and withdrawals, deposit verifications, debit cards, and discussions between the two regarding recruiting individuals bank account information and how the check fraud scheme works.

E. INSTAGRAM AND FACEBOOK ACCOUNT PRESERVATIONS

71. On November 7, 2023 writer submitted a preservation request to Meta Platforms, Inc via the Facebook law enforcement portal for the **Instagram ID: 31452828829 and Facebook ID: 100003177772977**.

TECHINICAL INFORMATION

72. Based on my training and experience, I am aware that individuals involved in criminal activity, including violent offenses with firearms, have also used websites and third-party applications, such as Facebook and Instagram, to communicate regarding their illegal activity and flaunt illegal firearms.

73. Meta Platforms, Inc. owns and operates the free-access social networking websites called Facebook and Instagram that can be accessed at <http://www.facebook.com> and <http://www.Instagram.com> respectively. Facebook/Instagram allow its users to establish accounts with Facebook/Instagram, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook/Instagram users, and sometimes with the general public.

74. Facebook/Instagram asks users to provide basic contact and personal identifying information to Facebook/Instagram, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook/Instagram passwords, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook/Instagram also assigns a user identification number to each account.

75. Facebook/Instagram also collects and retains information about how each user accesses and uses Facebook/Instagram. This includes information about the IP addresses used to create and use an account, unique identifiers and other information about devices and web browsers used to access an account, and session times and durations.

76. Each Instagram account is identified by a unique username chosen by the user. Users can change their usernames whenever they choose but no two users can have the same usernames at the same time. Instagram users can create multiple accounts and, if "added" to the primary account, can switch between the associated accounts on a device without having to repeatedly log in and log out.

77. Instagram users can also connect their Instagram and Facebook accounts to use certain cross-platform features, and multiple Instagram accounts can be connected to a single Facebook account. Instagram accounts can also be connected to certain third-party websites and mobile apps for similar functionality. For example, an Instagram user can "tweet" an image uploaded to Instagram to a connected Twitter account or post it to a connected Facebook account, or transfer an image from Instagram to a connected image printing service. Facebook maintains records of changed Instagram usernames, associated Instagram accounts, and previous and current connections with accounts on Facebook and third-party websites and mobile apps.

78. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a “Friend Request.” If the recipient of a “Friend Request” accepts the request, then the two users will become “Friends” for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user’s account includes a list of that user’s “Friends” and a “News Feed,” which highlights information about the user’s “Friends,” such as profile changes, upcoming events, and birthdays.

79. Instagram users can “follow” other users to receive updates about their posts and to gain access that might otherwise be restricted by privacy settings (for example, users can choose whether their posts are visible to anyone or only to their followers). Users can also “block” other users from viewing their posts and searching for their account, “mute” users to avoid seeing their posts, and “restrict” users to hide certain activity and prescreen their comments. Instagram also allows users to create a “close friends list” for targeting certain communications and activities to a subset of followers.

80. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create “lists” of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.



81. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post “status” updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming “events,” such as social occasions, by listing the event’s time, location, host, and guest list. In addition, Facebook users can “check in” to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user’s profile page also includes a “Wall,” which is a space where the user and his or her “Friends” can post messages, attachments, and links that will typically be visible to anyone who can view the user’s profile.

82. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It also provides users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos and videos associated with a user’s account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

83. Facebook users can exchange private messages on Facebook with other users. Those messages are stored by Facebook unless deleted by the user. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a chat feature that allows users to send and receive instant messages through Facebook Messenger. These chat communications are stored in the chat history for the account. Facebook also has Video and

Voice Calling features, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

84. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

85. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (*i.e.*, non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

86. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

87. Each Facebook account has an activity log, which is a list of the user’s posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as “liking” a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user’s Facebook page.

88. Instagram users have several ways to search for friends and associates to follow on Instagram, such as by allowing Facebook to access the contact list on their devices to identify which contacts are Instagram users. Facebook retains this contact data unless deleted by the user and periodically syncs with the user’s devices to capture changes and additions. Users can similarly allow Facebook to search an associated Facebook account for friends who are also Instagram users. Users can also manually search for friends or associates

89. Each Instagram user has a profile page where certain content they create and share (“posts”) can be viewed either by the general public or only the user’s followers, depending on the

privacy settings. Users can customize their profile by adding their name, a photo, a short biography (“bio”), and a website address.

90. One of Instagram’s primary features is the ability to create, edit, share, and interact with photos and short videos. Users can upload photos or videos taken with or store on their devices, to which they can apply filters and other visual effects, add a caption, enter the usernames of others (“tag”), or add a location. These appear as posts on the user’s profile. Users can remove posts from their profiles by deleting or archiving them. Archived posts can be reposted because, unlike deleted posts, they remain on Facebook servers.

91. Users can interact with posts by liking them, adding or replying to comments, or sharing them within or outside of Instagram. Users receive notification when they are “tagged” in a post by its creator or mentioned in a comment (user can “mention” others by adding their username to a comment followed by “@”). An Instagram post created by one user may appear on the profile or feeds of other users depending on several factors including privacy settings and which users were tagged or mentioned.

92. An Instagram “story” is like a post but can be viewed by other users for only 24 hours. Stories are automatically saved to the creator’s “Story Archive” and remain on Facebook servers unless manually deleted. The usernames of those who viewed a story are visible to the story’s creator until 48 hours after the story was posted.

93. Instagram allows users to broadcast live video from their profiles. Viewers can like and add comments to the video while it is live, but the video and any user interactions are removed from Instagram upon completion unless the creator chooses to send the video to IGTV, Instagram’s long-form video app.

94. Instagram's direct messaging service, allows users to send private messages to select individuals or groups. These messages may include text, photos, videos, posts, profiles, and other information. Participants to a group conversation can name the group and send invitations to other to join. Instagram users can send individual or group messages with "disappearing" photos or videos that can only be viewed by recipients once or twice, depending on settings. Senders can't view their disappearing messages after they are sent but do have access to each message status, which indicates whether it was delivered, opened, or replayed, and if the recipient took a screenshot. Instagram Direct also enables users to video chat with each other directly or in groups.

95. Instagram offers services such as Instagram Checkout and Facebook Pay for users to make purchases, donate money, and conduct other financial transactions within the Instagram platform, Facebook, and other associated websites and apps. Instagram collects and retains payment information, billing records, and transactional and other information when these services are utilized.

96. Instagram has a search function which allows users to search for accounts by username, user activity by location and user activity by hashtag. Hashtags, which are topical words or phrases preceded by a hash sign (#), can be added to posts to make them more easily searchable and can be "followed" to generate related updates from Instagram. Facebook retains records of a user's search history and followed hashtags.

97. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

98. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications ("apps") on the Facebook platform. When a

Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.

99. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

100. Facebook collects and retains location information relating to the use of an Instagram account, including user-entered location tags and location information used by Facebook to personalize and target advertisements.

101. Social networking providers like Meta Platforms, Inc. typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook or Instagram users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Meta Platforms, Inc. typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

102. As explained herein, information stored in connection with a Facebook or Instagram account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove

each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook or Instagram user's IP log, stored electronic communications, and other data retained by Meta Platforms, Inc., can indicate who has used or controlled the Facebook account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook or Instagram account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses; investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to "tag" their location in posts and Facebook "friends" to locate each other. This geographic and timeline information may tend to either inculcate or exculpate the Facebook account owner. Lastly, Facebook or Instagram account activity may provide relevant insight into the Facebook/ Instagram account owner's state of mind as it relates to the offense under investigation. For example, information on the Facebook/ Instagram account may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

103. Therefore, the computers of Meta Platforms, Inc. are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook/Instagram, such as account access information, transaction information, and other account information.

#### **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

104. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Meta, Inc. to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

#### **CONCLUSION**

105. Based on the foregoing, I request that the Court issue the proposed search warrant.

106. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving it on Meta Platforms, Inc. Because the warrant will be served on Meta Platforms, Inc., who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

107. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

108. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant



**ATTACHMENT A**

**Property to Be Searched**

This warrant applies to information associated with the **Instagram ID: 31452828829 and Facebook ID: 100003177772977** that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered at 1 Meta Way, Menlo Park, California, 94025.

## **ATTACHMENT B**

### **Particular Things to be Seized**

#### **I. Information to be disclosed by Meta Platforms, Inc.**

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta Platforms, Inc. (“Meta”), regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Meta, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Meta is required to disclose the following information to the government for each user ID listed in **Attachment A**:

- (a) All contact and personal identifying information, including the full name, user identification number, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers for user Account Name with the Usernames and Account IDs listed in **Attachment A**.
- (b) All activity logs for the account and all other documents showing the user’s posts and other Facebook or Instagram activities from **January 1, 2022, to present**;
- (c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them, including Exchangeable Image File (“EXIF”) data and any other metadata associated with those photos and videos;
- (d) All profile information; News Feed information; status updates; videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends’ Facebook user identification numbers; groups and networks of which the user is a member, including the groups’ Facebook/Instagram group

identification numbers; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Facebook applications;

- (e) All records or other information regarding the devices and internet browsers associated with, or used in connection with, that user ID, including the hardware model, operating system version, unique device identifiers, mobile network information, and user agent string;
- (f) All other records and contents of communications and messages made or received by the user from **January 1, 2022 through present**, including all Messenger activity, private messages, chat history, video and voice calling history, and pending “Friend” requests;
- (g) All “check ins” and other location information;
- (h) All IP logs, including all records of the IP addresses that logged into the account;
- (i) All records of the account’s usage of the “Like” feature, including all Facebook posts and all non-Facebook webpages and content that the user has “liked”;
- (j) All information about the Facebook pages that the account is or was a “fan” of;
- (k) All past and present lists of friends created by the account;
- (l) All records of Facebook searches performed by the account from **January 1, 2022 through present**;
- (m) All information about the user’s access and use of Facebook Marketplace;
- (n) The types of service used by the user;

- (o) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (p) All privacy settings and other account settings, including privacy settings for individual Facebook/Instagram posts and activities, and all records showing which Facebook users have been blocked by the account;
- (q) All records pertaining to communications between Facebook/Instagram and any person regarding the user or the user's Facebook/Instagram account, including contacts with support services and records of actions taken.
- (r) All content (whether created, uploaded, or shares by or with the Account), records, and other information relating to videos (including live videos and videos on IGTV), image stories and archived stories, past and current bios and profiles, posts and archived posts, captions, tags, nametags, comments, mentions, likes, follows, followed hashtags, shares, invitations, and all associated logs and metadata, from **January 1, 2022 to present.**
- (s) All content, records, and other information relating to communications sent from or received by the accounts in Attachment A including by not limited to:
  - a. The content of all communications sent from or received by the Accounts listed in Attachment A, including direct and group messages, and all associated multimedia and metadata, including deleted and draft content if available.
  - b. All records and other information about direct, group, and disappearing messages sent from or received by the Accounts listed in Attachment A including dates and times, methods, sources, and destinations (including

usernames and account numbers), and status (such as delivered, opened, replayed, screenshot)

- c. All records and other information about group conversations and video chats, including dates and times, durations, invitations, and participants
- d. All associated logs and metadata,
- (t) All content, records, and other information relating to all other interactions between the Accounts listed in Attachment A and other Instagram users from **January 1, 2022** through **present** including but not limited to:
  - a. Interactions by other Instagram users with the Accounts listed in Attachment A or its content, including posts, comments, like, tags, follows (including follows unfollows, approved and denied follow requests, and blocks and unblocks), shares invitations, and mentions
  - b. All users the Accounts listed in Attachment A has followed including the close friends list), unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow, and of users who have followed, unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow the account
  - c. All contacts and related sync information
  - d. All associated logs and metadata

Meta is hereby ordered to disclose the above information to the government within 10 days of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence, and instrumentalities of violations of 18 U.S.C. § 1951(a) (Hobbs Act robbery), 18 U.S.C. § 924(c) (possessing and/or brandishing a firearm during a crime of violence) involving OSMAN ALI, including, for each user ID identified on Attachment A, information pertaining to the following matters:

- (a) The relevant offense conduct, any preparatory steps taken in furtherance of the scheme, communications between ABU, YUSSUF, ALI, SERWIN, and others related to the relevant offense conduct of illegal use and possession of firearms and carjacking;
- (b) Evidence indicating how and when the Facebook account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;
- (c) Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;
- (d) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s); and
- (e) The identity of the person(s) who communicated with the user ID about matters relating to relevant offense conduct of the sale of firearms and sale and use of controlled substances, including records that help reveal their whereabouts.

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted

by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.